

FILED

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

2023 MAR 20 P 2:55

for the

District of

Division

Mrs. Najia Rahmani  
600 N. Garfield Street  
Arlington, VA 22201  
(202) 351-7354

Case No.

1:23 cv 373  
(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Courtney Erin Morgan Castellyzzo  
604 N. Garfield Street  
Arlington, VA 22201  
Jeff J. Certosimo (Same address)

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address

Walid Khalil Rahmani By Mother On His Behalf  
201 West Criser Road (Najia Rahmani)  
Front Royal 600 N. Garfield Street  
Virginia 22630 Arlington, VA 22201  
(202) 351-7354  
Held hostage

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Total Pages 10

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## Defendant No. 1

Name  
 Job or Title *(if known)*  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address *(if known)*

Stanley P. Dull  
 Sole owner of Independence Realty, LLC  
 10307 Piper Lane  
 Manassas  
 Virginia 20110  
 (703) 366-3462

## Defendant No. 2

Name  
 Job or Title *(if known)*  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address *(if known)*

Lima One Capital, LLC  
 201 E. McBee Avenue #300  
 Greenville  
 South Carolina 29601  
 (800) 390-4212

## Defendant No. 3

Name  
 Job or Title *(if known)*  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address *(if known)*

Paul Burnett (Manning & Murray, P.C.)  
 Estate planning attorney  
 6045 Wilson Blvd. #300  
 Arlington,  
 Virginia 22205

## Defendant No. 4

Name  
 Job or Title *(if known)*  
 Street Address  
 City and County  
 State and Zip Code  
 Telephone Number  
 E-mail Address *(if known)*

Thomas Norris  
 Agent of Woods Cove Inc., Stock & Bonded  
 201 West Criser Road  
 Front Royal  
 Virginia 22630  
 (540) 636-6611

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Conspiracy (18 U.S.C. § 371), Perjury as a Sentencing Factor (U.S.S.G. § 3C1.1) Law No. 44 § Article 6 First Amendment Right False Statement fictitious fraudulent Statement 18 U.S.C. 1001

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) n/a, is a citizen of the State of (name) \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_, Or is a citizen of (foreign nation) \_\_\_\_\_.



Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Punitive damages \$20,000,000 or more  
 Return our property of 604 N. Garfield Street, Arlington VA 22201  
 Void and null of deed which is fraudulently transferred.  
 Bring the defendants to justice.

## III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

For unbearable tolerance of separating a mother and son  
 violation of human right Law No. 44 Article 6 and first constitution amendment  
 using and also the Fourteenth Amendment fabrication by the defendant.  
 All the defendants lied and most of them are working for the government, and are not  
 our attorneys using our son (Walid Khalil Rahmani) as a tool to make money.

## IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Of release of our son (Walid Rahmani) from the nursing home to the Mother. Commonwealth attorney Eric claiming that I have dementia and sold the property 604 N. Garfield Street. There are much more.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Ms. Castelluzzo prior moving to 604 N. Garfield Street trespassed to inside the driveway broke the screen door and Mr. Bertosimo trespassed as well to the front door posted a letter and ran away from where I reside at 600 N. Garfield St, Arl., VA which I filed it with the criminal division of Arl. VA and she claimed I had trespassed to her property. As a result of that, they made a misdemeanor trespass charge against me.

# V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

## A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 17, 2023

Signature of Plaintiff

Printed Name of Plaintiff

Mrs. Najia Rahmani (Pro se)

## B. For Attorneys

Date of signing:

N/A

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

N/A



Additional  
Defendants No.5

Page 6

Name Jonathan S. Gelber, Esquire  
Job or Title Attorney (Guardian ad litem for Walid Rahmani)  
Street Address 201 Park Washington Court, First Floor  
City and County Falls Church  
State and Zip Code Virginia 22046  
Telephone Number (703) 237-1200

Defendant No.6

Name Christine R. Sanders  
Job or Title Asst. County Attorney  
Street Address 2100 Clarendon Blvd., Suite 403  
City and County Arlington  
State and Zip Code Virginia 22201  
Telephone Number (703) 228-3100

Defendant No.7

Name Derek Morch  
Job or Title Social Worker  
Street Address 2100 Washington Blvd.  
City and County Arlington  
State and Zip Code Virginia 22204  
Telephone Number

Page 7

Defendant No. 8

Name Louise Marciano  
Job or Title Social Worker & Aid of Jay Facett, Former County Board in Arl.  
Street Address 2100 Washington Blvd.  
City and County Arlington  
State and Zip Code Virginia 22204  
Telephone Number

Defendant No. 9

Name Jeffrey A. Scharf  
Job or Title Esquire  
Street Address P.O. Box 31800  
City and County Henrico  
State and Zip Code Virginia 23294  
Telephone Number (804) 545-2377

Defendant No. 10

Name John A. Rife  
Job or Title Esquire, Consulting Services, P.C.  
Street Address P.O. Box 31800  
City and County Henrico  
State and Zip Code Virginia 23294  
Telephone Number (804) 545-2377

Page 8

Defendant No. 11

Name Jackie Dean (Sales Agent) Pearson Smith Realty  
Job or Title Realtor Agent for our property of 604 N. Garfield Street  
Street Address 8315 Lee Hwy. #430 Arlington, VA 22201  
City and County Fairfax  
State and Zip Code Virginia 22031  
Telephone Number (571) 386-1075

Defendant No. 12

Name Paul F. Ferguson  
Job or Title Arlington County Circuit Court Clerk  
Street Address 1425 N. Courthouse Rd., 6th Floor  
City and County Arlington  
State and Zip Code Virginia 22201  
Telephone Number (703) 228-7010

Defendant No. 13

Name  
Job or Title Sheriff's Dept., Arl., VA  
Street Address 1425 N. Courthouse Rd., #9100  
City and County Arlington  
State and Zip Code VA 22201  
Telephone Number



Defendant No. 14

Page 9

Name Eric  
Job or Title Commonwealth Attorney Arlington, VA  
Street Address 1425 N. Courthouse Rd.  
City and County Arlington  
State and Zip Code Virginia 22201  
Telephone Number

Defendant No. 15

Name Christopher Sakalovsky  
Job or Title Attorney  
Street Address 2100 Clarendon Blvd.  
City and County Arlington  
State and Zip Code Virginia 22201  
Telephone Number

Defendant No. 16

Name Arlington Government  
Job or Title  
Street Address 2100 Clarendon Blvd. #215  
City and County Arlington  
State and Zip Code Virginia 22201  
Telephone Number

Defendant No. 17

10

Name Joann

Job or Title Nurse

Street Address 6045 Wilson Blvd. #300

City and County Arlington

State and Zip Code Virginia 22205

Telephone Number

FILED  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
DIVISION

FILED

2023 MAR 28 P 2:55

Plaintiff(s),

2023 MAR 28 P 2:55

v.

Civil Action Number: 1:23cv373

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of Complained.  
(Title of Document)

Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: 03-20-2023 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of \_\_\_\_\_.  
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Executed on: \_\_\_\_\_ (Date)